

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION  
OF THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to:

18-cv-07824; 18-cv-07827; 18-cv-07828;  
18-cv-07829; 19-cv-01781; 19-cv-01783;  
19-cv-01785; 19-cv-01788; 19-cv-01791;  
19-cv-01792; 19-cv-01794; 19-cv-01798;  
19-cv-01800; 19-cv-01801; 19-cv-01803;  
19-cv-01806; 19-cv-01808; 19-cv-01809;  
19-cv-01810; 19-cv-01812; 19-cv-01813;  
19-cv-01815; 19-cv-01818; 19-cv-01866;  
19-cv-01867; 19-cv-01868; 19-cv-01869;  
19-cv-01870; 19-cv-01871; 19-cv-01873;  
19-cv-01894; 19-cv-01896; 19-cv-01918;  
19-cv-01922; 19-cv-01926; 19-cv-01928;  
19-cv-01929; 19-cv-01931; 19-cv-10713;  
21-cv-05339.

**DECLARATION OF MARC A. WEINSTEIN IN SUPPORT OF PLAINTIFF  
SKATTEFORVALTNINGEN'S OPPOSITION TO DEFENDANTS' MOTIONS FOR  
SUMMARY JUDGMENT**

I, Marc A. Weinstein, an attorney duly admitted to practice law before the courts of the State of New York, hereby declare under penalty of perjury:

1. I am a partner at Hughes Hubbard & Reed LLP, counsel for Plaintiff Skatteforvaltningen ("SKAT") in these actions. I am fully familiar with the matters set forth in this declaration.

2. I submit this declaration in support of SKAT's Opposition to Defendants' Motions for Summary Judgment.

3. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the transcript of the deposition of Richard Markowitz, dated April 8, 2021 (Vol. 1).

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the transcript of the deposition of Richard Markowitz, dated April 9, 2021 (Vol. 2).

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the transcript of the deposition of Robert Klugman, dated January 28, 2021.

6. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the transcript of the deposition of Christian Ekstrand, dated May 6, 2021 (Vol. 1).

7. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the transcript of the deposition of Christian Ekstrand, dated May 7, 2021 (Vol. 2).

8. Attached hereto as Exhibit 6 is a true and correct copy of the Bates-stamped document WH\_MDL\_00222425, produced by the Markowitz Defendants in this litigation.

I, MARC A. WEINSTEIN, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
May 31, 2024

/s/ Marc A. Weinstein  
Marc A. Weinstein